

THROUGH U.S. DEPARTMENT OF TRANSPORTATION
DOCKET MANAGEMENT SYSTEM -- WWW.REGULATIONS.GOV

August 18, 2021

CIERVA SERVICE, LLC
561 SKYRANCH DRIVE,
SUITE B
PETALUMA, CA
94954

Federal Aviation Administration
c/o U.S. Department of Transportation
Docket Management Facility
1200 New Jersey Avenue, SE
West Building Ground Fl, Rm W12-140
Washington, DC 20590

Re: Petition for Exemption

Purpose: To provide relief from 14 C.F.R. §§91.9(a), §91.325 that will permit a person to be compensated when providing flight training, checking, recency, and testing events at Cierva Service in AutoGyro Primary category certified aircraft.

Public Interest:

- Training and proficiency are the cornerstone to aviation safety. Without the ability to train, maintain proficiency, or accomplish FAA-mandated recency or testing with an authorized instructor on board, safety is compromised. It is in the Public's Interest to maintain the ability of Cierva Service to train in our aircraft.

Equivalent Level of Safety

- Cierva Service has operated this and other Primary Category aircraft at a more than equivalent level of safety without incident or compromise to aviation safety.
- A comprehensive training program exists for the aircraft in question.
- Cierva Service finds high value in maintaining proficiency and accomplishing training, checking, and testing in the actual aircraft to be operated, especially as no options for these procedures exist in standard category aircraft. Flight characteristics and aircraft operations specific to the AutoGyro aircraft enable the pilot to receive type-specific training—critical to this type of aircraft.

- A similar exemption for Limited Category aircraft has been granted. [Exemption No. 18860, Regulatory Docket No. FAA-2021-0623-0001] That exemption differs in that it allows compensation for operation of Limited Category aircraft; this request is for compensation for the individual providing training and aircraft use related to instruction and testing for Primary Category aircraft, the categorization of which was specifically created to allow for that purpose [AC No: 21-37].

Cierva Service requests that the FAA consider that based on the safety and public interest shown over the years of operation, the exemption should be granted to reflect the previous, popularly understood meaning of the term “for compensation”. Therefore, we respectfully request that the FAA issue an exemption that will permit the owner (Cierva Service) to conduct flight training in these aircraft. If there are any questions or need for additional information, please contact our office at (813)-482-2626 and we will promptly respond.

Sincerely,

Michael Burton
COO
Cierva Service, LLC